

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

MAKSIM TSVETOVAT, et al.,)
)
)
Plaintiffs,)
)
v.) CIVIL ACTION NO. 1:12CV510 TSE
)
SEGAN, MASON & MASON, P.C.,)
)
Defendant.)
)

MOTION FOR SANCTIONS

Defendant, Segan, Mason & Mason, P.C. (“Segan Mason”), by counsel, moves the Court to impose sanctions against M. Nawaz Raja and Neelum Nawaz Raja (the “Rajas”). Segen Mason seeks sanctions against the Rajas in the amount the attorneys’ fees it incurred as a result of the blatant misrepresentations and baseless accusations asserted by the Rajas in the course of this litigation. The reasons in support of this motion are more fully set forth in Segen Mason’s Memorandum in Support, filed contemporaneously herewith and incorporated by reference, which sets forth the factual and legal basis for sanctions and the appropriate quantum of sanctions.

WHEREFORE, Segen Mason respectfully requests that the Court grant its Motion for Sanctions and enter judgment, jointly and severally, against the Rajas for their deplorable actions in this case.

Respectfully submitted,

SEGAN, MASON & MASON, P.C.

By: _____ “/s/”
William D. Bayliss

William D. Bayliss, Esquire (VSB # 13741)

bbayliss@williamsmullen.com

Brendan D. O'Toole, Esq. (VSB #71329)

botoole@williamsmullen.com

Williams, Mullen, Clark & Dobbins, P.C.

200 South 10th Street

Richmond, VA 23219

Telephone: (804) 420-6000

Facsimile: (804) 420-6507

Counsel for Segan, Mason & Mason, P.C.

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of June, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Kristi C. Kelly, Esquire (VSB # 72791)

kkelly@siplfir.com

SUROVALL ISAACS PETERSEN & LEVY PLC

4010 University Drive, Suite 200

Fairfax, VA 22030

T: (703) 251.5400

F: (703) 591.9285

Counsel for Plaintiffs

Leonard A. Bennett, Esquire (VSB # 37523)

lenbennett@clalegal.com

Susan M. Rotkis, Esq. (VSB # 40693)

srotkis@clalegal.com

CONSUMER LITIGATION ASSOCIATES, P.C.

763 J. Clyde Morris Boulevard, Suite 1-A

Newport News, VA 23601

T: (757) 930.3660

F: (757) 930.3662

Counsel for Plaintiffs

I also hereby certify that I have mailed (via certified mail) a true and correct copy of this Response to the following:

M. Nawaz Raja and Neelum Nawaz Raja
42907 Parkbrooke Court
Broadlands, VA 20148

By: "/s/"
William D. Bayliss, Esquire (VSB No. 13741)
bbayliss@williamsmullen.com
Brendan D. O'Toole, Esq. (VSB #71329)
botoole@williamsmullen.com
Williams, Mullen, Clark & Dobbins, P.C.
200 South 10th Street
Richmond, VA 23219
T: (804) 420-6000; F: (804) 420-6507
Counsel for Segan, Mason & Mason, P.C.

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